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Court Reporting and
Litigation Services

Erica Preiss

September 9, 2020

David Whitt v. City of St. Louis, et al.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DAVID WHITT,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:18-cv-1294
)	
CITY OF ST. LOUIS, et al.,)	
)	
Defendants.)	

MULTI-PLATFORM VIDEO CONFERENCE
DEPOSITION OF ERICA PREISS

Taken on behalf of Plaintiff
September 9, 2020

Kathy Heeb, CCR #1361

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
4 DAVID WHITT,)
5)
6 Plaintiff,)
7)
8 vs.) No. 4:18-cv-1294
9)
10 CITY OF ST. LOUIS, et al.,)
11)
12 Defendants.)
13)
14)
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25)

1 DEPOSITION OF ERICA PREISS, produced,
2 sworn, and examined on behalf of Plaintiff, September
3 9, 2020, commencing at 1:02 p.m. and concluding at
4 1:28 p.m., via telephone, before Kathy Heeb, a
5 Certified Shorthand Reporter for the State of
6 Missouri.
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9
10
11
12

13 APPEARANCES VIA TELEPHONE

14 For Plaintiff:

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19 JULIAN BUSH, CITY COUNSELOR
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23 (314) 622-4694
24
25

EXAMINATION BY MR. MOBLEY

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1 IT IS HEREBY STIPULATED AND AGREED by and
2 between Counsel for the Plaintiff and Counsel for the
3 Defendants, that this deposition may be taken in
4 shorthand by Kathy Heeb, a Certified Shorthand
5 Reporter, and afterwards transcribed into typewriting,
6 and the signature of the witness is waived by
7 agreement of counsel and the witness.

8 O-O-O

9 ERICA PREISS,
10 having been first duly sworn, was
11 examined and testified as follows:

12 * * * * *

13 EXAMINATION

14 BY MR. MOBLEY:

15 Q. Hi there. Is it Miss Preiss or do you have
16 a title that you prefer to go by?

17 **A. Miss is fine.**

18 Q. Okay. So my name is Pat Mobley. I
19 represent the plaintiff, David Whitt, in this case.
20 And would you please just start by stating and
21 spelling your name for the record, please?

22 **A. Yes, it's Erica Preiss. Erica spelled**
23 **E-r-i-c-a, and then Preiss is P-r-e-i-s-s.**

24 Q. Thank you.

25 And you understand that you're here to

1 testify on behalf of the City of St. Louis?

2 **A. I do.**

3 Q. One moment while I bring a document up.

4 Miss Preiss, can you see the document in
5 front of you?

6 **A. Yes.**

7 Q. Okay. So this is the amended notice of
8 deposition. And as I scroll down, you are here to
9 testify regarding topic No. 19, which reads: Data or
10 statistics maintained by SLMPD or the City relating to
11 or reflecting over the last six years, A, the number
12 of individuals arrested for taking video of police
13 officers and charged with violation of section
14 15.10.010 of the St. Louis Municipal Ordinance Code;
15 and B, the outcome of those charges.

16 Does that sound right to you?

17 **A. That's what I understand, yes.**

18 Q. Great. Thank you.

19 Have you ever been deposed before?

20 **A. Yes, once before. A few weeks ago.**

21 Q. I'm sorry, your voice isn't coming through.

22 **A. Okay. Maybe let me try to take out the...**

23 MS. DUNCAN: I can hear her.

24 THE WITNESS: Can you hear me better?

25 MS. DUNCAN: That's worse on my end.

EXAMINATION BY MR. MOBLEY

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1 THE WITNESS: And this is just as bad.

2 MS. DUNCAN: That's better on my end.

3 THE WITNESS: What about for Pat?

4 MR. MOBLEY: I got nothing.

5 THE WITNESS: That better?

6 MR. MOBLEY: I still can't hear you. I
7 wonder if you're muted or something.

8 MS. DUNCAN: No, I can hear her.

9 THE WITNESS: I'm not muted.

10 MR. MOBLEY: Abby, can you hear her?

11 MS. DUNCAN: Yes.

12 MR. MOBLEY: So then it's on my end.

13 THE WITNESS: Are you dialed in on the
14 phone or the computer? Because I don't have my
15 microphone on.

16 MS. DUNCAN: He should be through the
17 phone.

18 THE WITNESS: Yeah, I can't hear Abby
19 either. I'm going to hang up and call in again
20 because I don't know what else would be keeping me
21 from hearing everything else, so it will just be a
22 moment. I'm sorry about this.

23 (Pause in proceedings.)

24 Q. (BY MR. MOBLEY) Have you been deposed
25 remotely before?

1 **A. A couple weeks ago I was deposed with the**
2 **same Adobe Connect.**

3 Q. Okay. So you may be a little familiar with
4 some of the difficulties that pop up, but, you know,
5 we just try to be patient with one another. If
6 anything comes up where you can't hear me or anything
7 like that, you experience technical difficulties, let
8 us know right away and we will just do what we have to
9 do.

10 So to quickly get back to what --

11 MR. MOBLEY: Kathy, I'd like to mark as P1,
12 which again is the deposition notice.

13 (Exhibit 1 is deemed marked.)

14 Q. (BY MR. MOBLEY) And you agreed that you're
15 prepared to testify on behalf of the City of St. Louis
16 to No. 19, is that correct?

17 **A. Yes.**

18 Q. And you mentioned that you've been deposed
19 remotely before. About how many times have you been
20 deposed?

21 **A. I think -- I don't know if it's technically**
22 **deposed. I was like a specialist witness for a**
23 **federal case. I don't know if that's the same.**

24 Q. Okay.

25 So just like in a normal deposition, except

1 that it's even more important when we're remote, we
2 have to try to not speak over each other. Kathy is
3 trying to get down everything we say into the record,
4 so if we speak over one another, that makes it much
5 more difficult on her.

6 Similarly, please try to avoid nodding your
7 head or shaking your head no. Say yes or no. Even
8 um-hum and huh-uh can't really be reflected on the
9 record, so if it's a yes-or-no question, just please
10 say yes or no.

11 And if you don't understand a question, let
12 me know and I'll do my best to improve it to make it
13 easier for you to answer. So if I ask a question and
14 you answer, can I assume you've understood it?

15 **A. Yes.**

16 Q. And if you don't know the answer to the
17 question, just tell us that. You don't have to guess.
18 And if at any point you come up with a clarification
19 or additional information that you'd like to
20 supplement one of your answers, whether it's the one
21 you're currently giving or one from previous in the
22 deposition, feel free to supplement your answers at
23 any time.

24 And then of course I expect this will be a
25 very, very short deposition. If we do need to take a

1 break, if you need to take a break, let us know. We
2 can accommodate that for sure.

3 So is there any reason that you can't give
4 accurate answers today?

5 **A. I don't believe so. I'm confident --**

6 Q. What did you do -- excluding the contents
7 of your conversations with your attorney, what did you
8 do to prepare for the deposition today?

9 **A. Whenever we received this document, I did a**
10 **search within our records management system which**
11 **houses our -- the SLMPD reports, and I did a search**
12 **for the contents of No. 19.**

13 Q. Did you review the result of that search?

14 **A. I was able to get a result set. The record**
15 **management system, our vendor is Hexagon. The**
16 **software is called I/LEADS. It does not have any sort**
17 **of field or data entry point for officers to**
18 **specifically indicate someone was arrested for taking**
19 **a video of a police officer. So to get this data, I**
20 **did a search for the violation of 1510010. And that**
21 **resulted in over 400 incident reports. I did not**
22 **review all of those.**

23 Q. Okay. And thank you for giving me all that
24 information.

25 Before we get into the meat of what we're

1 here to talk about, let me just ask you a few
2 questions about you.

3 What's the highest level of education that
4 you've completed?

5 **A. I have a master's degree in criminology and**
6 **criminal justice from the University of Missouri**
7 **St. Louis.**

8 Q. Do you know what year you got your
9 master's?

10 **A. I believe it was 2015.**

11 Q. And do you have any licenses or
12 certifications related to police work?

13 **A. No.**

14 Q. So you -- let's start with -- strike that.
15 So how long have you been working for
16 SLMPD?

17 **A. I've been working for seven years.**

18 Q. What was your first position?

19 **A. My first position, my title was business**
20 **analyst level 1.**

21 Q. How long were you a business analyst 1?

22 **A. I don't remember whenever city -- when the**
23 **city took back control over the police department.**
24 **Which at that time I think it was in 2014, my title**
25 **changed to systems analyst.**

1 Q. What's your current title?

2 A. The same. Systems analyst.

3 Q. Okay.

4 Have your duties been largely the same
5 since you started working for SLMPD?

6 A. Yes.

7 Q. Just briefly describe your roles and
8 responsibilities as a systems analyst.

9 A. I work with a team of other application
10 development specialists, and we create software for
11 the department. I also administrate other softwares
12 that we purchase from vendors. I troubleshoot
13 technical issues. I conduct business analysis for the
14 police department whenever we're pursuing different
15 projects that have a scope within IT. It's general IT
16 management.

17 Q. And so turning to the search that you did,
18 looking for the contents of No. 19, which is the
19 number of individuals arrested for videotaping police
20 and charged with a violation of 15.10.010, and then
21 the outcome of those charges.

22 So your testimony was that you searched for
23 those parameters, but the most specific parameter that
24 you could search by was the ordinance that was
25 violated, is that correct?

1 **A. Yes.**

2 Q. And that yielded approximately 400 incident
3 reports?

4 **A. Yes.**

5 Q. What was the time period -- I'm sorry.
6 Strike that.

7 Was there information in the database
8 regarding the outcome of those charges?

9 **A. Our management system, I/LEADS, does not**
10 **contain the outcome of those charges, so I was not**
11 **able to perform a search within the I/LEADS system to**
12 **get the outcomes of those charges.**

13 Q. Is there another system that does have the
14 outcomes of the charges?

15 **A. Yes. That is a system called LEWeb Arrest**
16 **maintained by REJIS, and that's what SLMPD uses to**
17 **document the official arresting, as well as any of the**
18 **charges that they bring to present at the prosecutors.**
19 **And the outcome of whatever the prosecutors determine**
20 **at that time is what is captured in the LEWeb system.**
21 **We do not have any information about what the courts**
22 **have decided on those charges.**

23 Q. Okay. Okay.

24 Do all incident reports that are entered
25 into I/LEADS wind up -- or are they also entered into

1 LEWeb?

2 **A. No. You would only enter arrest data into**
3 **LEWeb arrest. So if a person was arrested, that's**
4 **when you would create a record in LEWeb Arrest. An**
5 **incident report documents a crime has occurred and**
6 **basic incident data.**

7 Q. Okay.

8 So would you be able to search in LEWeb for
9 arrests for violating 15.10.010?

10 **A. Yes.**

11 Q. And did you do that here?

12 **A. No.**

13 Q. Why not?

14 **A. Because we -- the condition, A, the number**
15 **of individuals arrested for taking a video wouldn't**
16 **have been captured in there.**

17 Q. It wasn't captured in I/LEADS either,
18 correct?

19 **A. Correct. There is no stand-out data field**
20 **that would capture that, but if someone were to review**
21 **the narratives of those police reports, they could**
22 **identify any records that were responsive to that**
23 **request.**

24 Q. And so do the -- does the narrative not
25 make its way into LEWeb, then?

1 **A. There is no narrative portion for the LEWeb**
2 **Arrest system.**

3 Q. Okay.

4 So if you were to put in all of the work
5 that's necessary to provide the information that was
6 requested in topic No. 19, about how many hours of
7 labor do you suppose that would take?

8 **A. Well, I may not be best to speak on this,**
9 **but we could -- we could get a listing of complaint**
10 **numbers, and -- that have that 1510010 charge on it,**
11 **and then someone would have to review those. And I**
12 **don't know how long it would take whomever gets**
13 **assigned that task -- it would not be IT, it would be**
14 **someone -- some other team. I don't know how long it**
15 **would take them to review the 400 reports to then give**
16 **IT a listing of, here are responsive complaint**
17 **numbers, and then we can take that data set and then**
18 **look it up in LEWeb to see what kind of outcomes on**
19 **the charges that are documented in LEWeb Arrest --**

20 Q. I see.

21 **A. -- jumping between --**

22 Q. Yeah, I'm sorry, I interrupted you. Go
23 ahead.

24 **A. I just want to say it's kind of jumping**
25 **between different systems and different pieces because**

1 **of the different tasks that have to happen.**

2 Q. So is it accurate to say that the most time
3 intensive aspect that would be required is reviewing
4 the approximately 400 incident reports to find which
5 ones involved recording police?

6 A. **In my opinion, yes.**

7 Q. The data that exists in I/LEADS regarding
8 each of these cases, is there a usual amount for how
9 much data is contained in each entry?

10 A. **I do not understand what.**

11 Q. That was a bad question.

12 So if you found a particular -- well, let
13 me ask you this. Is anything beyond incident reports
14 stored on I/LEADS?

15 A. **It's a records management system, so it**
16 **also has external modules that are related to incident**
17 **report management. So there is a case management**
18 **module for detectives to use. There is master names,**
19 **master vehicles. It's a standard record management**
20 **for policing system.**

21 Q. So aside from an incident report, what else
22 might be included in I/LEADS regarding a particular
23 incident?

24 A. **I'm not really understanding what you mean**
25 **aside from an incident report. Maybe if you --**

1 Q. Sure.

2 A. -- defined -- define to me what you think
3 an incident report contains.

4 Q. Okay. So I'm imagining an incident report
5 is a list of pertinent information gathered by either
6 the arresting officer or an investigating officer.
7 Because I don't think digitally yet, I'm imagining a
8 form, a piece of paper that has that information on
9 it. And so are there other sorts of forms or data
10 entry spaces that are not directly related to the
11 incident report but are in I/LEADS?

12 A. So what I'm hearing you say is are there
13 fields within the software that don't get printed on
14 the physical copy of the incident report. Like if
15 you --

16 Q. Yes.

17 A. -- ask SLMPD for a printed copy, are there
18 other fields?

19 Q. Right.

20 A. Yes.

21 Q. What are some examples of those other
22 fields?

23 A. Let me think. I would have to probably
24 like go and review it, but...

25 Q. If you can't come up with a specific

1 example, that's okay.

2 How is information entered into I/LEADS?

3 **A. Officers enter the information.**

4 Q. [Inaudible].

5 **A. I think you broke up on that. I didn't**
6 **hear you.**

7 Q. Do officers also enter information into
8 LEWeb?

9 **A. Yes.**

10 Q. Does every incident report in I/LEADS
11 contain or relate to, I suppose, a particular law or
12 ordinance that was allegedly violated?

13 **A. No. We have incident reports that contain**
14 **noncriminal incidences. Like a --**

15 THE WITNESS: Abby, were you talking?

16 MS. DUNCAN: No, I'm sorry.

17 THE WITNESS: Oh, okay.

18 **A. We'll have incidents for like suicides or**
19 **something like that, noncriminal incidences.**

20 MR. MOBLEY: Okay. I have no further
21 questions. Thank you, Miss Preiss.

22 MS. DUNCAN: Erica, you can review your
23 transcript in this case, make sure that the court
24 reporter took down everything you said accurately, or
25 you can waive signature and trust that she's taken

1 everything down. It's up to you as to whether you
2 want to read or waive.

3 THE WITNESS: Can I say it now?

4 MS. DUNCAN: Sure, yes.

5 THE WITNESS: I'll waive. I'll trust in
6 the professionals.

7

8 (Whereupon the deposition concluded at
9 1:28 p.m.)

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1 REPORTER CERTIFICATE

2

3 I, KATHY HEEB, a Certified Shorthand
4 Reporter, do hereby certify that there came before me
5 via telephone,

6 ERICA PREISS

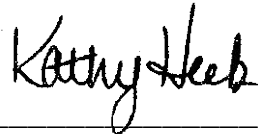
7 who was by me first duly sworn; that the witness was
8 carefully examined, that said examination was reported
9 by myself, translated and proofread using
10 computer-aided transcription, and the above transcript
11 of proceedings is a true and accurate transcript of my
12 notes as taken at the time of the examination of this
13 witness.

14 I further certify that I am neither
15 attorney nor counsel for nor related nor employed by
16 any of the parties to the action in which this
17 examination is taken; further, that I am not a
18 relative or employee of any attorney or counsel
19 employed by the parties hereto or financially
20 interested in this action.

21 Dated this 16th day of September 2020

22

23

24 
Kathy Heeb, CSR, CLR

25

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